

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V draft No. V-98-024
SONOCO PRODUCTS COMPANY
HENDERSON, KY.
October 9, 1998
MANESH JAYAGOPAL

SOURCE DESCRIPTION:

Group Requirements: This group includes all emission points emitting VOC's, excluding insignificant activities. The list of EP's includes the following:

- 01 (01) - 502 curing oven
- 02 (02) - 401 curing oven
- 03 (03) - 502 aluminum folded ring pull end press
- 04 (04) - 300 aluminum folded ring pull end press
- 05 (05) - 502 steel top end strip press
- 06 (06) - 502 steel bottom end strip press
- 08 (08) - 300 aluminum blank end press
- 09 (09) - 502 aluminum blank end press
- 11 (11) - 401 aluminum blank end press
- 12 (12) - 401 curing oven
- 13 (13) - 201 aluminum ring pull end press
- 14 (14) - Scroll sheer waxers
- 15 (15) - Compound transfer station
- 16 (16) - Mobile compound transfer station
- 18 (18) - Mixing drum
- 19 (19) - Tab press
- 20 (20) - 401 aluminum ring pull end press
- 21 (21) - 502 aluminum ring pull end press
- 22 (22) - 30 gallon parts washer
- 23 (23) - 80 gallon parts washer
- 26 (26) - 211 aluminum blank end press
- 27 (27) - 300 & 211 curing oven
- 28 (28) - 300 aluminum ring pull end press
- 29 (29) - 211 aluminum ring pull end press
- 32 (32) - 502 aluminum ring pull end press
- 33 (33) - 502 aluminum end press

COMMENTS:

The only applicable regulation to these emission points is 401 KAR 63:022, New or modified sources emitting toxic air pollutants. Per the requirements of this regulation the emissions of the regulated toxic pollutants emitted by this plant have been limited to the levels allowed in previous permits for this facility. The only change that has been made is that the allowables have been converted to a plant-wide limitation.

401 KAR 59:225, New miscellaneous metal parts and products surface coating operations, does not apply to those emission points, among those listed above, that were constructed after June 24, 1992. This is because the compounds containing VOC that are used in the listed emission points are only applied either as beads around the rim of the steel and aluminum lids or as lubricants in the manufacture of the parts. Since the compounds used do not coat a significant area of the product, nor do they function as a decorative or protective coating, the Division has determined that these compounds do not qualify as coatings under 401 KAR 59:225. It should be noted that 401 KAR 61:125, Existing can coating operations, specifically lists 'end sealing compound' as a regulated compound and specifically exempts those with a VOC content below 3.7 lbs/gal. However, the miscellaneous metal parts regulation neither defines this compound nor specifies an exempt limit which leads to the conclusion that these compounds are not covered by 401 KAR 59:225. Further, the classification date for 401 KAR 61:125 is June 29, 1979, and in addition, it only applies to sources areas designated non-attainment for ozone. There is no regulation for new non-beverage can coating operations at the present time.

EMISSION CAPS:

In addition to 401 KAR 63:020, if the source were to emit VOCs at its maximum potential emissions rate 401 KAR 51:017, Prevention of significant deterioration to air quality (PSD), would apply. Therefore, to preclude the applicability of this regulation, the plant has opted for a total plant-wide emissions limit of 225 TPY of VOC from the emission points listed above, which would keep the total emissions below the PSD threshold of 250 TPY. Compliance with this plant wide cap on VOC emissions, represented as a twelve month rolling average, shall be ensured through a monthly calculation of the total VOC emissions from the applicable emission points, as well as appropriate recordkeeping and reporting requirements. The proposed calculation is based on the conservative assumption that all the VOCs contained in the solvents used at these emission points will be emitted to the atmosphere. Thus, the VOC emissions from the plant will be calculated as summation of the products of the total monthly usage of each VOC-containing compound and its corresponding VOC content.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.